

**MEMO ENDORSED**

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USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 8/1/2023

July 31, 2023

**Via ECF**

Hon. Valerie E. Caproni  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: GateGuard, Inc. v. Goldmont Realty Corp., et al.  
Case No.: 1:20-cv-01609 (VEC) (GWG)  
Arbitration Status Update

Dear Judge Caproni:

I represent Plaintiff GateGuard, Inc. ("Plaintiff") in the above referenced action. I write on behalf of the parties in response to the Court's order dated July 7, 2023 to provide an update on the status of arbitration. Dkt 172.

On July 14, 2023, Plaintiff made the payment required to reopen the arbitration case initially filed on February 28, 2023. *See* Exhibit A at 1. At the same time, Defendants accepted the American Arbitration Association's Commercial Division Rules as also required. *Id.* at 2. Accordingly, the case has been reopened as GateGuard v. Goldmont, 01-23-0000-8507, and assigned to a case manager who will reach out to the parties shortly with further instructions. Exhibit A at 1.

The parties will further advise the Court once a schedule for the arbitration has been established.

Respectfully Submitted,

*Den Quainton*

Eden P. Quainton

cc: Simcha Schonfeld – [sds@kandsllp.com](mailto:sds@kandsllp.com)

The parties are directed to provide joint status updates on the arbitration proceedings every three months on the first business day of the month, with the next update due **November 1, 2023**.

SO ORDERED.

A handwritten signature in blue ink, appearing to read "Valerie Caproni".

Date: 8/1/2023

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE

**EXHIBIT A**

RE: GateGuard v. Goldmont, 01-23-0000-8507

Amy Rubino <RubinoA@adr.org>

Fri 7/14/2023 4:57 PM

To: Eden Quainton <equainton@gmail.com>

Cc: Eden Quainton <eden.quainton@quaintonlaw.net>; Ari B. Teman <ari@teman.com>

Hello,

The payment has been received, thank you for your prompt payment.

The case has now been assigned to your case manager who will reach out shortly with further instruction.

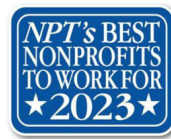
Thank you for choosing American Arbitration Association as you dispute resolution service.

Thank you,  
Amy



**Amy Rubino**  
**Case Filing Supervisor**

American Arbitration Association  
International Centre for Dispute Resolution  
T: 856 679 4616 F: 877 304 8457 E: RubinoA@adr.org  
1101 Laurel Oak Road, Suite 100, Voorhees, NJ 08043  
[adr.org](http://adr.org) | [icdr.org](http://icdr.org) | [aaamediation.org](http://aaamediation.org)



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**From:** Eden Quainton <equainton@gmail.com>

**Sent:** Friday, July 14, 2023 4:48 PM

**To:** AAA Gregory Marrone <GregoryMarrone@adr.org>

**Cc:** Eden Quainton <eden.quainton@quaintonlaw.net>; Amy Rubino <RubinoA@adr.org>; Ari B. Teman <ari@teman.com>

**Subject:** Re: GateGuard v. Goldmont, 01-23-0000-8507

**\*\*\* External E-Mail – Use Caution \*\*\***

Yes, I have been in touch and tge payment link has been forwarded to Mr. Teman.

Thank you again for your help!

Eden

On Fri, Jul 14, 2023, 4:43 PM AAA Gregory Marrone <[GregoryMarrone@adr.org](mailto:GregoryMarrone@adr.org)> wrote:

Good Afternoon,

I am passing this along to our intake team. They will be in touch with you regarding reactivating the previously filed case or let you know if you need to resubmit a new filing.

Sincerely,



**AAA Gregory Marrone**  
**Manager of ADR Services**

American Arbitration Association

T: 917 438 1689 F: 866 644 0234 E: [GregoryMarrone@adr.org](mailto:GregoryMarrone@adr.org)  
120 Broadway, 21st Floor, New York, NY 10271  
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**From:** Eden Quainton <[eden.quainton@quaintonlaw.net](mailto:eden.quainton@quaintonlaw.net)>  
**Sent:** Friday, July 14, 2023 4:24 PM  
**To:** Amy Rubino <[RubinoA@adr.org](mailto:RubinoA@adr.org)>  
**Cc:** AAA Gregory Marrone <[GregoryMarrone@adr.org](mailto:GregoryMarrone@adr.org)>; Ari B. Teman <[ari@teman.com](mailto:ari@teman.com)>  
**Subject:** RE: GateGuard v. Goldmont, 01-23-0000-8507

**\*\*\* External E-Mail – Use Caution \*\*\***

Dear Amy,

Attached please find our adversary's consent to the Commercial Division Rules. We would like to opt for the flexible payment option if possible. The client will pay the fee directly. The client is Ari Teman, CEO of GateGuard, and is copied on this email.

I would be grateful if the specialist could indicate the full-front fee and the flexible fee so my client has all the information.

Thank you so much for your help!

Eden Quainton

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Tel: 212-419-0575  
Cell: 202-360-6296  
<https://quaintonlaw.net>

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**From:** Amy Rubino <[RubinoA@adr.org](mailto:RubinoA@adr.org)>  
**Sent:** Friday, July 14, 2023 4:00 PM  
**To:** Eden Quainton <[eden.quainton@quaintonlaw.net](mailto:eden.quainton@quaintonlaw.net)>  
**Subject:** GateGuard v. Goldmont, 01-23-0000-8507

Dear Eden,

I recently called and left a voicemail about the above mentioned case, as you have reached out for assistance.

Please return my call at your earliest convenience so I may further assist.

My contact information is below.

Thank you,  
Amy



**Amy Rubino**  
**Case Filing Supervisor**

American Arbitration Association  
International Centre for Dispute Resolution  
T: 856 679 4616 F: 877 304 8457 E: [RubinoA@adr.org](mailto:RubinoA@adr.org)  
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